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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Attention: Wireline Competition Bureau

RE: WC Docket No. 10-90

Dear Ms. Dortch:

The Chillicothe Telephone Company and its holding company Horizon Telecom ("CTC"), which have elected Alternative Connect America Model ("A-CAM") support in their Ohio study area (Study Area Code 300597), hereby submit their comments in response to the Wireline Competition Bureau's Public Notice (*Wireline Competition Bureau Announces Results of Rate-of-Return Carriers that Accepted Offer of Model Support*), WC Docket No. 10-90, DA 16-1246, released November 2, 2016.

CTC elected A-CAM pursuant to the "glide path" provisions of Section 54.311(e) of the Commission's Rules. In so doing, CTC opted to accept an ultimate offer of \$1,465,554 in annual A-CAM support, a post-transition reduction of \$5,259,474 annually from its 2015 legacy support of \$6,725,028.

CTC understands that initial demand for A-CAM support has exceeded the Commission's initial budget, and that the Bureau is considering various revisions to the initial A-CAM support offers and associated build-out obligations. In making such changes, CTC strongly recommends that the Bureau accept and freeze the A-CAM support and associated build-out obligations elected by it and the other Section 54.311(e) "glide path" companies. While this is clearly in CTC's interest, it is also in the overall public interest because it will free up additional amounts of funding each year for the A-CAM mechanism as transition payments decrease, and will eliminate the adverse impacts upon the budget for the remaining Rate-of-Return companies that might otherwise result from the provisions of Paragraph 69 and Footnote 141 of the Commission's March 30, 2016 Order in this proceeding.

CTC is ready, willing and able to stand by its initial A-CAM election. However, if its ultimate annual A-CAM support is reduced below \$1,465,554, or if its per location support benchmark and/or build-out obligations are revised significantly, it will have to reconsider its initial election.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Peter M. Holland".

Peter M. Holland
CFO, Horizon Telecom